

## AFFIDAVIT

**State of Alabama**

**Elmore County**

BEFORE ME, the undersigned Authority, appeared Freddie Nunn, who is known to me and who, having duly sworn, deposed and states as follows:

My name is Freddie Nunn, I have been a resident of Montgomery County, Alabama, for more than six months and I am over the age of twenty-one years.

I am the Meat Processing Supervisor of Institutional Services Division of the Alabama Department of Corrections. My duties include the supervision of inmates assigned to Meat Processing Section.

"On February 23, 2006 at approximately 9:35 am, Cedric Pugh, Plaintiff B/M AIS# 182373 was on the production floor working on the mixer machine. Inmate Pugh came to me and said his left hand was caught in the machine. I asked to look at his hand and saw his middle finger cut. I immediately called Elmore Correctional Facility, Back-gate, to pick up Inmate Pugh. At approximately, 9:45 am, Officer Hamm from Elmore Correctional Facility arrived to pick him up and transport him to Staton Correctional Facility, Health Care Unit. Inmate Pugh was trained to work on every machine he was assigned on the first day here at Meat Processing Division. The first machine was the mixer machine on that day he was told how to run the mixer and not to put his hands inside it. We told him how important it is to keep his hands out of this mixer machine and all others too.

  
Freddie Nunn

SWORN and SUBSCRIBED before me this the 25<sup>th</sup> day of May, 2006.

  
NOTARY PUBLIC

Commission expires

My commission expires:

March 29, 2008

EXHIBIT

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